

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DEIRDRE LEANE AND IPNAV, LLC ,	§	
	§	
Plaintiffs,	§	Civil Action No. 3:20-cv-03097-B
v.	§	
	§	
UNIFIEDONLINE, INC and	§	
CHANBOND, LLC,	§	
	§	
Defendants.	§	

PLAINTIFFS’ MOTION TO AMEND DOCKET NO. 47

Plaintiffs Deirdre Leane (“Leane”) and IPNAV, LLC respectfully submit this Motion to Amend Docket No. 47, pursuant to Rules 52(b), 60(b)(6), and Local Rule 7, to vacate that portion of the Court’s decision and order denying their application for a preliminary injunction (the “Decision”) that addressed the Court’s findings regarding the proper construction of the Interest Sale Agreement (“ISA”) between Leane and Defendants ChanBond LLC (“ChanBond”) and UnifiedOnline, Inc. (“Unified”).

Pursuant to Local Rule 7, filed concurrently herewith are Plaintiffs’ Brief in Support of Their Motion to Amend Docket No. 47 and Plaintiffs Appendix in Support of their Motion to Amend Docket No. 47. The grounds contained in the Brief in Support are incorporated as if fully herein. As such, the Court should grant Plaintiffs’ motion, under Rules 52 and 60(b), and vacate that portion of the Decision as addressed the interpretation of the relevant contractual provisions.

Respectfully submitted,

/s/ J. Sean Lemoine

J. Sean Lemoine

Texas State Bar No. 24027443

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ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

On November 18, 2020, a conference was held between Akiva M. Cohen (counsel for the Plaintiffs) and Linda Stahl (counsel for the Defendants). Defendants are opposed to the relief sought in this motion.

/s/ J. Sean Lemoine

J. Sean Lemoine

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2020, a true and correct copy of the foregoing documents was served through the Court's CM/ECF System on all counsel of record.

/s/ J. Sean Lemoine

J. Sean Lemoine